

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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WALDIMIR CALVA, individually
and on behalf of others similarly situated,

CASE NO.: 1:23-cv-07414-MKB-CLP

Plaintiff,

NOTICE OF MOTION

v.

VLAD FINE CRAFT, INC., a New York
Corporation, and VLAD NIKABADZE,
an individual,

Defendants.

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PLEASE TAKE NOTICE THAT, in accordance with Rule 55(b)(2) of the Federal Rules of Civil Procedure 55(b)(2), Civil Rule 55.2 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, and rule 4(G) of this Court's Individual Rules of Practice in Civil Cases, Plaintiff, through his undersigned counsel, moves for default judgement against Defendants Vlad Fine Craft, Inc., and Vlad Nikabadze.

Answering papers, if any, shall be served on the undersigned no later than fourteen days after service of the moving papers in accordance with Local Rule 6.1(b), or at such other time as the Court may direct.

Dated: April 29, 2024.

Respectfully Submitted,

Law Offices of Nolan Klein, P.A.

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